

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Date 9-18-00 Reporter CB

Focal Communications Corporation of Illinois)
 and)
 Illinois Bell Telephone Company)
 (Ameritech Illinois))
)
)
 Joint Petition for Review of an Arbitrated)
 Interconnection Agreement)

00 - 0526

**STATEMENT IN SUPPORT OF APPROVAL OF NEGOTIATED PORTIONS OF
 INTERCONNECTION AGREEMENT**

I, Willena D. Slocum, am Project Manager-Negotiations for Southwestern Bell Telephone Company/Illinois Bell Telephone Company Negotiations and Interconnection, and submit this Statement in support of Approval of negotiated portions of the Interconnection Agreement between Focal Communications Corporation of Illinois ('Focal') and Illinois Bell Telephone Company ('Ameritech Illinois').

This proceeding was initiated by a Joint Petition for Review of the Commission's arbitration award in Docket 00-0027. A copy of the entire Agreement was attached to the Petition. The Commission approved the arbitrated portions of the Agreement in an Interim Order dated August 15, 2000. On August 16, 2000 Hearing Examiners, on their own motion, reopened the record to set a hearing and schedule pertaining to the negotiated portions of the Agreement.

The Agreement establishes the financial and operational terms for: the physical interconnection between Ameritech Illinois' and Focal's networks based on mutual and reciprocal compensation; unbundled access to Ameritech Illinois' network elements, including Ameritech Illinois' operations support system functions; physical collocation; number portability; resale; and a variety of other business relationships. The Agreement expires August 19, 2003. Upon expiration of the initial term, the Agreement shall automatically be renewed for additional one (1) year periods ("renewal term") unless a Party delivers to the other Party written notice of termination of the Agreement at least one hundred twenty (120) days prior to the expiration of the initial term or a renewal term.

Under Section 252(e)(2)(A) of the Telecommunications Act of 1996 (TA96), the Commission may reject a Negotiated Agreement only if the Agreement or a portion thereof "... discriminates against a telecommunications carrier not a party to the agreement" or "... implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity". Because these portions of the original Agreement were the product of voluntary negotiation, they do not have to comply with the standards set forth in Sections 251(b) and (c), thus rendering inapplicable the pricing standards set forth in Section 252(d).

The negotiated portions of the Agreement are not discriminatory. Ameritech Illinois will make the negotiated portions of this Agreement available to any other telecommunications carrier operating within Ameritech Illinois' service territory. Other telecommunications carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

The negotiated portions of the Agreement are consistent with the public interest, convenience and necessity. These portions of the agreement are the result of good faith negotiations between the parties. The negotiated portions of the Agreement enable Focal to provide a competitive alternative in Ameritech Illinois' service territory.

The negotiated portions of the Agreement meet all the requirements of the Act and should be approved by the Commission

STATE OF TEXAS)
)
COUNTY OF DALLAS)

VERIFICATION

Willena D. Slocum, being first duly sworn, states on oath that she is Director-Contract Management for Southwestern Bell Telephone Company/Illinois Bell Telephone Company Negotiations and Interconnection, and that the facts stated in the foregoing Statement in Support of Approval of Negotiated Portions of an Arbitrated Interconnection Agreement between Ameritech Illinois and Focal Communications Corporation of Illinois ("Focal") are true and correct to the best of her knowledge, information and belief.

Willena D. Slocum
Willena D. Slocum

Subscribed and sworn
to before me this
6th day of September 2000

Vicki S. Fernandez
Notary Public

